

CR# 05-1740-CBS

AFFIDAVIT FOR A CRIMINAL COMPLAINT

I, Christopher Brandt, being duly sworn, depose and state the following:

1. I am a special agent with the U.S. Department of State, Diplomatic Security Service ("DSS"), and have been so since July 2004. I have successfully completed a three-month training program in conducting criminal investigations at the Federal Law Enforcement Training Center in Brunswick, Georgia, and a four-month advanced training program with the DSS in Dunn Loring, Virginia. My duties as a DSS special agent include conducting investigations involving the fraudulent acquisition, production, and use of U.S. and foreign passports and U.S. visas. I am familiar with the methods, routines and practices of document counterfeiters, vendors and other persons who fraudulently obtain or assume false identities. I am aware that it is a violation of 18 U.S.C. § 1546(a) for anyone to knowingly utter, use, attempt to use, possess, obtain, accept, and receive, immigrant and nonimmigrant visas and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing such documents to be forged, counterfeited, altered, or falsely made, or to have been otherwise procured by fraud or

unlawfully obtained.

2. Based on my training and knowledge, and the experience of other agents and law enforcement officers with whom I have worked on identity fraud matters, I am aware that document counterfeiters, vendors and other persons who assume or sell false identities must be in possession of, or have ready access to, identification documents for many other persons.
3. This affidavit is based upon information supplied to me by other law enforcement officers, my personal involvement in this investigation, and my training and experience. In submitting this affidavit, I have not included each and every fact known to me about the investigation, but only those facts which I believe are sufficient to establish the requisite probable cause in support of an application for a criminal complaint charging Danilo Pereira TETZNER ("TETZNER"), d/o/b 1/10/1981, a/k/a Davi Campos PEREIRA, a/k/a "Danny", with violating 18 U.S.C. § 1546(a).

FACTS

4. For the past two months, Somerville Police officers, Massachusetts State Police officers, and federal agents, including myself, have been investigating TETZNER and his associates, including Edemilson DE ALMEIDA, a/k/a Robson DESOUSA, a/k/a Leonardo PROTOS, for passport and visa fraud,

credit card fraud, check fraud and identity theft.

5. As part of this investigation, on Monday, May 30, 2005, at approximately 1800 hours, state and local police officers located and arrested Robson DESOUSA, on Brook Street in Chelsea, Massachusetts, on outstanding default warrants issued from the Malden and Chelsea District Courts. DESOUSA indicated to police at the time of his arrest that he was also known as Edemilson DE ALMEIDA.
6. When DE ALMEIDA was arrested, he possessed two Brazilian passports, one Brazilian birth certificate and one Brazilian driver's license. One of the passports and the driver's license were in the name of Leonardo PROTOS, d/o/b 5/10/80. However, DE ALMEIDA's picture was affixed to each of these documents. The passport in the name of PROTOS contained what appears to be a U.S. immigrant visa. The second passport was in the name of Atila Farias NUNES, d/o/b 7/21/83, but also contained DE ALMEIDA's picture.
7. According to DE ALMEIDA, individuals, usually Brazilians in the United States illegally, often approached him with photos of themselves, seeking new identities. DE ALMEIDA stated that he took these photos to TETZNER at TETZNER's home at 22B Mill Street, Woburn, Massachusetts. DE ALMEIDA witnessed TETZNER use a computer in the basement at that location to make false documents. According to DE ALMEIDA

and others, TETZNER charged between \$300 to \$2,500 for producing these documents.

8. On June 1, 2005 Massachusetts State Police searched 22B Mill Street, Woburn, MA, pursuant to a search warrant issued by the Massachusetts District Court, Woburn Division. I and other DSS special agents were present when this warrant was executed. Officers found numerous items indicating that TETZNER lived at that address, including a lease with TETZNER's name on it. Officers also found numerous items related to manufacturing and altering passports and visas in the residence, including:

- Grey/black CD case containing blank visas and passports
- One box of photo-copied visas
- One box of photo-copied Brazilian birth certificates
- One passport in the name of Spader, one U.S. visa in the name of TETZNER, photos, returned checks, and utility bills
- Laminating paper, paper cutter, Citizens Bank statement, Resident Alien card, Social Security card in the name of Jossy Alves Da Silva, prescription in the name of Davi Pereira, blank Citizens bank check in the name of Bruna Munique Cota Ferreira, blue spiral memo book, photocopy of star seal, rotary trimmer, wooden cutting board, metal ruler
- Yellow lunch box containing assorted stationary items, open box of checks in the name of Davi Campos Pereira, photos, returned checks, photo paper, laminating pouches, photo sheet of an unidentified female, various RMV documents, full sheets of adhesive paper, colored poster paper, monthly banking statements in the name of Periera.

- Konica laser printer, serial number 6352899239
 - Lexmark copier, serial number 11100234009
 - Tan briefcase containing stamp, black wallet, passport, and assorted papers in name of Danilo TETZNER, copies of blank passport pages, and 5 CDs
 - Hewlett Packard CPU, serial number USO4305526
11. Pursuant to search warrant 05-1692-CBS, issued by this Court on July 14, 2005, the contents on the 5 CDs and the hard drive of the Hewlett Packard CPU were copied and searched. A preliminary examination of the contents reveals numerous digital images of U.S. visas, Brazilian passports, and other identification documents.

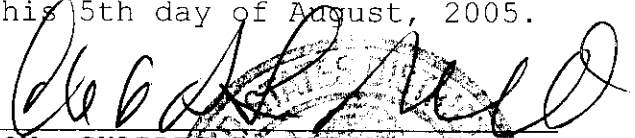
CONCLUSION

12. Based upon the forgoing, I have probable cause to believe that Danilo Pereira TETZNER did knowingly utter, use, attempt, possess, obtain, accept, and receive immigrant and nonimmigrant visas and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing such documents to be forged, counterfeited, altered, or falsely made, and to have been otherwise procured by fraud or unlawfully obtained, in violation of 18 U.S.C. § 1546(a).

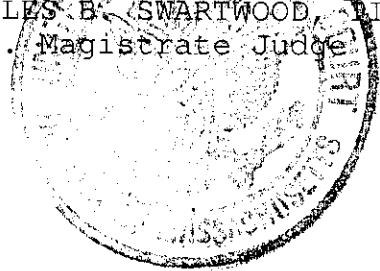


CHRISTOPHER BRANDT
Diplomatic Security Service

Subscribed and sworn to before me, this 5th day of August, 2005.



HON. CHARLES B. SWARTWOOD, III
Chief U.S. Magistrate Judge



AO 442 (Rev. 5/93) Warrant for Arrest

United States District Court

DISTRICT OF

UNITED STATES OF AMERICA

v.

WARRANT FOR ARREST

Danilo Pereira Tetzner

aka Davi Campos Pereira aka Danny

CASE NUMBER: 05-1740-CBS

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest

Danilo Pereira Tetzner aka Davi Campos Pereira aka Danny
Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

☐ Indictment ☐ Information ☐ Complaint ☐ Order of court ☐ Violation Notice ☐ Probation Violation Petition

charging him or her with (brief description of offense)

uttering, using, attempting to use, possessing, obtaining, accepting and receiving immigrant and nonimmigrant visas and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing such documents to be forged, counterfeited, altered, and falsely made, or to have been procured by means of any false claim and statement, or to have been otherwise procured by fraud or unlawfully obtained

in violation of
Title

18

United States Code, Section(s) 1546(a)

Charles B. Swartwood, III

Name of Issuing Officer

Chief U.S. Magistrate Judge

Title of Issuing Officer

08-05-2005

Date and Location

Signature of Issuing Officer:



Bail fixed at \$

by

Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

AO 442 (Rev. 5/93) Warrant for Arrest

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: Danilo Pereira Tetzner

ALIAS: a/k/a Davi Campos Pereira, a/k/a "Danny"

LAST KNOWN RESIDENCE: 22B Mill Street, Woburn, MA

LAST KNOWN EMPLOYMENT: _____

PLACE OF BIRTH: Sao Paulo, Brazil

DATE OF BIRTH (4 digit year): 00-00-1981

SOCIAL SECURITY NUMBER (last 4 digits only): _____

HEIGHT: _____

WEIGHT: _____

SEX: Male

RACE: Hispanic

HAIR: Brown

EYES: Brown

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS: _____

FBI NUMBER: _____

COMPLETE DESCRIPTION OF AUTO: _____

INVESTIGATIVE AGENCY AND ADDRESS: _____

JS 45 (5/97) - (Revised USAO MA 6/29/04)

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Woburn Category No. II Investigating Agency DSS

City Woburn Related Case Information:

County Middlesex Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number MI-05-1692-CBS
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Danilo Pereira Tetzner Juvenile ☐ Yes ☒ No

Alias Name a/k/a Davi Campos Pereira, a/k/a Danny

Address 22B Mill Street, Woburn, MA

Birth date (Year only): 1981 SSN (last 4 #): _____ Sex M Race: Hispanic Nationality: Brazilian

Defense Counsel if known: _____ Address: _____

Bar Number: _____

U.S. Attorney Information:

AUSA S. Waqar Hasib Bar Number if applicable California 234818

Interpreter: ☒ Yes ☐ No List language and/or dialect: Portuguese

Matter to be SEALED: ☐ Yes ☒ No

☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status: _____

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____
☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial
☐ On Pretrial Release: Ordered by _____ on _____

Charging Document: ☒ Complaint ☐ Information ☐ Indictment

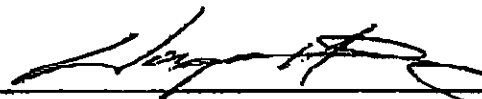
Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: August 4, 2005

Signature of AUSA: _____



JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Danilo Pereira Tetzner, a/k/a Davi Campos Pereira, a/k/a Danny

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. 1546(a)</u>	<u>Fraud and misuse of visas</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: